

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE:

**MERCY HOSPITAL, IOWA CITY,
IOWA, et al.,**

Debtors.

DAN R. CHILDERS, Trustee,

Plaintiff

vs.

MEDIFIS, INC., et al

Defendants.

Chapter 11

CASE NO. 23-00623(TJC)

ADV NO. 25-09123

(Jointly Administered)

**DEFENDANT HEALTH CAROUSEL TRAVEL NETWORK, LLC'S ANSWER TO
COMPLAINT TO AVOID PREFERENCE**

(Related to Doc. No. 2046)

I. JURISDICTION, PARTIES AND VENUE

Defendant Health Carousel Travel Network, LLC (“Health Carousel”), by and through the undersigned, hereby submits this Answer to Trustee Dan R. Childer’s Complaint to Avoid Preference (Complaint filed at Dkt. No. 2046).

1. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 1 and therefore denies the same.
2. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 2 and therefore denies the same.
3. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 3 and therefore denies the same.

4. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 4 and therefore denies the same.

5. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 5 and therefore denies the same.

6. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 6 and therefore denies the same.

7. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 7 and therefore denies the same.

8. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 8 and therefore denies the same.

9. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 9 and therefore denies the same.

10. Health Carousel admits the allegations in paragraph 10.

11. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 11 and therefore denies the same.

12. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 12 and therefore denies the same.

13. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 13 and therefore denies the same.

14. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 14 and therefore denies the same.

15. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 15 and therefore denies the same.

16. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 16 and therefore denies the same.

17. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 17 and therefore denies the same.

18. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 18 and therefore denies the same.

19. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 19 and therefore denies the same.

20. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 20 and therefore denies the same.

21. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 21 and therefore denies the same.

22. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 22 and therefore denies the same.

23. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 23 and therefore denies the same.

24. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 24 and therefore denies the same.

25. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 25 and therefore denies the same.

26. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 26 and therefore denies the same.

27. Health Carousel is without knowledge or information sufficient to form a belief as

to the allegations in paragraph 27 and therefore denies the same.

28. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 28 and therefore denies the same.

29. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 29 and therefore denies the same.

30. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 30 and therefore denies the same.

31. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 31 and therefore denies the same.

32. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 32 and therefore denies the same.

33. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 33 and therefore denies the same.

34. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 34 and therefore denies the same.

35. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 35 and therefore denies the same.

36. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 36 and therefore denies the same.

37. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 37 and therefore denies the same.

38. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 38 and therefore denies the same.

39. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 39 and therefore denies the same.

40. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 40 and therefore denies the same.

41. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 41 and therefore denies the same.

42. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 42 and therefore denies the same.

43. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 43 and therefore denies the same.

44. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 44 and therefore denies the same.

45. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 45 and therefore denies the same.

46. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 46 and therefore denies the same.

47. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 47 and therefore denies the same.

48. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 48 and therefore denies the same.

49. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 49 and therefore denies the same.

50. Health Carousel is without knowledge or information sufficient to form a belief as

to the allegations in paragraph 50 and therefore denies the same.

51. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 51 and therefore denies the same.

52. Paragraph 52 of the Complaint requires Health Carousel to make a legal conclusion that it is not required to make. To the extent a response is required, denied.

53. Paragraph 53 of the Complaint requires Health Carousel to make a legal conclusion that it is not required to make. To the extent a response is required, denied.

54. Paragraph 54 of the Complaint requires Health Carousel to make a legal conclusion that it is not required to make. To the extent a response is required, denied.

II. FACTS

55. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 55 and therefore denies the same.

56. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 56 and therefore denies the same.

57. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 57 and therefore denies the same.

58. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 58 and therefore denies the same.

59. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 59 and therefore denies the same.

60. Health Carousel is without knowledge or information sufficient to form a belief as to the allegations in paragraph 60 and therefore denies the same.

61. Health Carousel is without knowledge or information sufficient to form a belief as

to the allegations in paragraph 61 and therefore denies the same.

FIRST AFFIRMATIVE DEFENSE

1. The Complaint fails to state a claim for which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

2. The Court lacks jurisdiction over this action.

THIRD AFFIRMATIVE DEFENSE

3. The Court lacks jurisdiction over Health Carousel.

FOURTH AFFIRMATIVE DEFENSE

4. Any amounts paid during the preference period were contemporaneous exchanges for new value, for subsequent new value, or made in the ordinary course of business.

/s/ Patrick B. Dillon
Patrick B. Dillon AT 0001973
Attorney for Creditor

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically on the date of filing through the Court's ECF System on all ECF participants registered in this case.